

UNITED STATES OF AMERICA

- v. -

JAROMY PITTARIO,
a/k/a "Jaromy Jannard-Pittario,"

Defendant.

S1 21 Cr. 475 (ALC)

The United States Attorney charges:

2. It was a part and an object of the conspiracy that JAROMY PITTARIO, a/k/a "Jaromy Jannard-Pittario," the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of

executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and would and did take and receive therefrom, a matter and thing, and would and did cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matter and thing, to wit, PITTARIO and others solicited investments in a start-up company ("Start-Up-1") under false pretenses, including by falsely representing Start-Up-1's financial solvency, its access to cash, use of investor funds, and PITTARIO's personal access to cash, and in connection therewith, caused stock certificates and executed credit and investment agreements to be sent to victims via private interstate carriers, in violation of Title 18, United States Code, Section 1341.

3. It was further a part and object of the conspiracy that JAROMY PITTARIO, a/k/a "Jaromy Jannard-Pittario," the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent

pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writing, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, PITTARIO and others solicited investments in Start-Up-1 under false pretenses, including by falsely representing Start-Up-1's financial solvency, its access to cash, use of investor funds, and PITTARIO's personal access to cash, and used and caused the use of interstate wire communications and transfers in furtherance of those acts, in violation of Title 18, United States Code, Section 1343.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, JAROMY PITTARIO, a/k/a "Jaromy Jannard-Pittario," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about June 18, 2019, PITTARIO spoke by cellphone with a victim ("Victim-1") to discuss the terms of a potential loan and investment in Start-Up-1 when Victim-1 was located in lower Manhattan and PITTARIO was in California.

b. On or about June 19, 2019, PITTARIO emailed Victim-1 electronic copies of financial records that had been

falsified to make it appear as though PITTARIO personally possessed sufficient assets to guarantee repayment of a \$1,000,000 loan from Victim-1's company to Start-Up-1.

c. On or about June 26, 2019, Victim-1 received by private commercial carrier executed hardcopies of the loan agreement between Victim-1's company and Start-Up-1, which had been sent from California to the offices of Victim-1's company in lower Manhattan.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Superseding Information, JAROMY PITTARIO, a/k/a "Jaromy Jannard-Pittario," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Defendant.

SUPERSEDING INFORMATION

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(18 U.S.C. § 371.)

DAMIAN WILLIAMS
United States Attorney.
